

Hayden that they were trying to procure the appropriate contact information for the declarants. On April 22, Defendants' counsel informed Mr. Hayden that they would represent Mr. Green in connection with his deposition and accept service of the subpoena for same, but that he was not available until he was finished participating in the NBA Playoffs. Last evening, Mr. Green's team, the Philadelphia 76ers, were eliminated from the NBA Playoffs, and Mr. Hayden has asked Defendants' counsel to promptly provide Mr. Green's earliest availability for deposition.

In addition, Mr. Hayden has been diligently working to schedule the depositions of Mr. James and Mr. Thompson through their respective counsel. On April 27, Defendants provided contact information for Mr. Thompson, through which Mr. Hayden was able to identify Mr. Thompson's counsel on May 5. And on May 3, Defendants provided contact information for Mr. James, through which Mr. Hayden has been attempting to serve the deposition subpoena and determine Mr. James's availability. Since then, Mr. Hayden has diligently been attempting to schedule the depositions of Mr. James and Mr. Thompson with and through their counsel, according to their earliest availability (and remains hopeful the depositions may be scheduled soon without the necessity of seeking intervention from the Court).

In all events, it is apparent that Mr. Hayden will need time after May 16 to conduct these depositions. Mr. Hayden requests that the Court extend the deadline for deposing these declarants until June 10. Good cause exists to extend the May 16 deadline. Mr. Hayden has been diligently trying to schedule these depositions at the declarants' earliest availability. Defendants will not be prejudiced by this extension, as it is necessary to accommodate Defendants' counsel's request to wait until Mr. Green is finished with the NBA Playoffs. Furthermore, such extension will not affect the recently re-scheduled trial date.

For all the foregoing reasons, Plaintiff respectfully requests that the Court grant this
Unopposed Motion.

Dated: May 13, 2022

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on May 13, 2022, a copy of the foregoing was filed electronically. Notice of this filing was sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt, and parties may access this filing through the Court's system.

/s/ Andrew Alexander

One of the attorneys for Plaintiff